

1 HONORABLE RICARDO S. MARTINEZ  
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7 UNITED STATES DISTRICT COURT  
8 FOR THE WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE  
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1112 BERNADETTE HIGHTOWER, on behalf of  
13 herself and all other similarly situated,  
1415 Plaintiff,  
16  
17 v.  
1819 RECEIVABLES PERFORMANCE  
20 MANAGEMENT, LLC,  
2122 Defendant.  
2324 Case No.: 2:22-cv-01683-RSM  
25  
2627 **SUPPLEMENTAL DECLARATION OF  
28 PATRICK M. PASSARELLA OF KROLL  
SETTLEMENT ADMINISTRATION LLC  
IN CONNECTION WITH FINAL  
APPROVAL OF SETTLEMENT**30 I, Patrick M. Passarella, declare as follows:  
31  
3233 **INTRODUCTION**  
3435 1. I am a Senior Director of Kroll Settlement Administration LLC (“Kroll”),<sup>1</sup> the  
36 Settlement Administrator appointed in the above-captioned case, whose principal office is located  
37 at 2000 Market Street, Suite 2700, Philadelphia, Pennsylvania 19103. I am over 21 years of age  
38 and am authorized to make this declaration on behalf of Kroll and myself. The following statements  
39 are based on my personal knowledge and information provided by other experienced Kroll  
40 employees working under my general supervision.  
4142 2. This declaration supplements the *Declaration of Patrick M. Passarella of Kroll*  
43 *Settlement Administration LLC in Connection with Final Approval of Settlement*, filed on October  
44 18, 2024 (the “Initial Declaration”), in order to provide updated information to the Court regarding  
45 Notice Program Reach, Claim Activity, and the number of Requests for Exclusion and objections  
46 received by Kroll. The Initial Declaration is incorporated herein by reference in its entirety.  
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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the  
50 Settlement Agreement and Release entered into in this Action.  
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## **NOTICE PROGRAM REACH**

2       3.     On July 16, 2024, Kroll established a toll-free telephone number, (833) 522-1750,  
3 for Class Members to call and obtain additional information regarding the Settlement through an  
4 Interactive Voice Response (“IVR”) system. As of November 26, 2024, the IVR system has  
5 received 9,225 calls, and 151 callers have been connected to live operators.

6       4. As of November 26, 2024, 6,953 Short Form Notices were returned by the USPS  
7 with a forwarding address. 6,843 Short Form Notices were automatically re-mailed to the updated  
8 addresses provided by the USPS. The remaining 110 Short Form Notices were re-mailed to the  
9 updated addresses provided by the USPS. In addition to the foregoing, nine (9) additional Short  
10 Form Notices were returned a second time and re-mailed by Kroll to a second updated address  
11 provided by the USPS.

12        5. As November 26, 2024, 329,459 Short Form Notices were returned by the USPS  
13 as undeliverable as addressed, without a forwarding address. Kroll ran 326,659 undeliverable  
14 records through an advanced address search.<sup>2</sup> The advanced address search produced 254,598  
15 updated addresses. Kroll has re-mailed Short Form Notices to the 254,598 updated addresses  
16 obtained from the advanced address search. Of the 254,598 re-mailed Short Form Notices, 4,628  
17 have been returned as undeliverable a second time.

## CLAIM ACTIVITY

19       6.       The Claims Deadline was November 12, 2024. As of November 26, 2024, Kroll has  
20 received 515 Claim Forms through the mail and 23,974 Claim Forms filed electronically through  
21 the Settlement Website. Kroll is still in the process of reviewing and validating Claim Forms.

## **EXCLUSIONS AND OBJECTIONS**

23 7. The Opt-Out and Objection Deadlines were November 12, 2024.

24        8.        As of November 26, 2024, Kroll has received an additional twenty-three (23)  
25 Requests for Exclusion, for a total of thirty-six (36) Requests for Exclusion, and three (3) additional  
26 objections to the Settlement, for a total of five (5) objections. One objector, Mary Clarke, has also

<sup>28</sup> <sup>2</sup> As directed by the Parties, the remaining 2,800 Short Form Notices were not remailed as they were received after the final advanced address search was executed.

1 submitted a claim. An updated list of the Requests for Exclusion received is attached hereto as  
2 **Exhibit A**, and the five (5) objections are attached hereto as **Exhibits B through F**.

3 **CERTIFICATION**

4 I declare under penalty of perjury under the laws of the United States that the above is true  
5 and correct to the best of my knowledge and that this declaration was executed on November 26,  
6 2024, in Delaware, Ohio.

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9 PATRICK M. PASSARELLA  
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# Exhibit A

## Exclusion List

Count	Record Identification Number
1	83079CZ1KZ8PD
2	83079FZ9TXFHV
3	83079FBX032R4
4	83079H7CDGSZG
5	83079H542RSD4
6	83079D7Y6FZ71
7	83079CD0FNFKB
8	83079F85GWJYX
9	83079GH43K0TM
10	83079DNY2NCY7
11	83079FWKV3TG0
12	83079NK7QRY2J
13	83079FJ90D9RQ
14	83079H9DMVNT1
15	83079F165T17B
16	83079CDTVSXSD7
17	83079GVW492RX
18	83079GXV0P40M
19	83079G99R8SHY
20	83079FSGTQ1N7
21	83079CYVV9RTV
22	83079CG33098D
23	83079HD9TFTYZ
24	83079GB23716P

# Exhibit B

Dear Sir,

My Name is Anielle  
Mal Davis I am the  
Guardian of Dominique  
Davis will like to object  
to the Settlement

Thank you

Annie Marie Davis Case 2:22-cv-01683-RSM

17 SEP 2024 PM 3 U

A Thinking of You card featuring a large script "Thinking of You" in the center. The word "Thinking" is written in a flowing script, and "of You" is in a smaller, more formal script. To the left of the main text is a blue "f 23". Above the main text is a small "Mail a card" note. To the right is a graphic of the American flag with a flower in the top right corner. Below the main text is a decorative flourish. In the bottom right corner, the word "FREEDOM" is written in large, bold, serif capital letters, with "FOREVER/USA" in smaller letters underneath. The entire card has a white background with a subtle grid pattern.

RPM Date Incident Settlement  
4/10/1981 Kroll Settlement Administration  
P.O. Box 225391 NEW YORK, NY 10150-5391

10150-539191

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# Exhibit C

Object:

Reason: Stay in the Settlement Class

Explain: I'm from the Old school paper there were NOT Computer, we all brought those story's those Company Was selling about more Service reach out kept up with the time,

so thing change. Then we got all things faster & better living master mind.

America Are the Only Natural Data get cyberattack they Data, OR that NOT Known why is that??

so I want the companies that let my Data get taken let them know your Service can or can't keep my Data safe Leaves the business move with the time important,

but until My Object Settlement Class



RPM Data incident Settlement  
c/o Kroll Settlement Administration LLC  
P.O. Box 225391  
New York, N.Y. 10150-5391

1015005391 8030

1015005391 8030

# Exhibit D

Settlement Administrator  
in Settlement in Hightower  
et al. v. Receivables Performance  
Management, LLC, Case No. 2:22-cv-01683-RSM

11-6-24

Totally Object to the whole thing. Sorry barely writing to you. I've been a little busy. I'm going through Stolen Identity as well as Bankruptcy Court allegedly. I also have appeals going on all at the same time. Benefits appeal. Extra jobs I've never worked for. I've been at my same job for going on almost 2 yrs. Lived in ~~another~~ same state Texas I have so much paperwork on Stolen Identity. Recent Transcripts from IRS. Having to wait for info on Different Companies. My mail is barely starting to find me again after two years. I'm not doing nothing on Online due to the fact thats how they were able to get in. So I'm writing to everyone sending Stolen Identity case. I have multiple credit reports. Bank statements. Yes would love reimbursement for all the extra stuff I've been having to pay for that I had no control over. All my Credit Bureaus should be frozen for two years already. Also HHS Department has info with multiple accounts. Extra jobs I never even applied to. I'm waiting on a appeal also. allegedly one of my Biological Fathers incarcerated and allegedly have a child support lawyer that was never hired. Wrote to her already. Please update my info. Thank you if any questions don't hesitate to reach out.

Erica Ann Arevalo

Erica Arevalo  
Birthday



FEDERAL TRADE COMMISSION

## Identity Theft Report

FTC Report Number: [REDACTED]

I am a victim of Identity theft. This is my official statement about the crime.

## Contact Information

First Name:	Middle Name:	Last Name:
Erica	Ann	Arevalo
Address:	Phone:	Email:
[REDACTED]	[REDACTED]	[REDACTED]

## Personal Statement

[REDACTED]

## Accounts Affected by the Crime

Credit Card Opened by the Thief	
Company or Organization:	[REDACTED]
Date that I discovered it:	Total fraudulent amount:
1/2020	\$ 0

## Landline Phone Account Opened by the Thief

Company or Organization:	[REDACTED]
Date that I discovered it:	Total fraudulent amount:
1/2020	\$ 0

## Fraudulent Checking or Savings Account

Company or Organization:	[REDACTED]
Date that I discovered it:	Total fraudulent amount:
1/2020	\$ 0

## Check Fraud

Company or Organization:	[REDACTED]
Date that I discovered it:	Total fraudulent amount:
1/2020	\$ 0

## Suspect Information

Contact Information	Address: [REDACTED] Email Address: [REDACTED]
Relationship	Other

Under penalty of perjury, I declare this information is true and correct to the best of my knowledge.

I understand that knowingly making any false statements to the government may violate federal, state, or local criminal statutes, and may result in a fine, imprisonment, or both.

Erica Ann Arevalo  
Erica Ann Arevalo

7/15/2022  
Date

Use this form to prove to businesses and credit bureaus that you have submitted an FTC Identity Theft Report to law enforcement. Some businesses might request that you also file a report with your local police.

U.S. POSTAGE PAID  
FCM LETTER

Retail



NOV 06, 2024

**\$5.58**

S2324K504088-22

RDC 99

RPM Data Incident Settlement  
c/o Kroll Settlement Administration LLC  
P.O. Box 225391  
New York, NY 10150-5391

10150-539191



# Exhibit E

c/o Kroil Settlement Administration LLC  
P.O. Box 225391  
New York, NY 10150-5391

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CA  
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**ELECTRONIC SERVICE REQUESTED**

**RPM Data Incident Settlement**

**U.S. District Court for the WESTERN  
DISTRICT OF WASHINGTON**

Hightower, et al. v. Receivables Performance Management, LLC, Case No. 2:22-cv-01683-RSM

**IF YOU WERE NOTIFIED BY RECEIVABLES  
PERFORMANCE MANAGEMENT, LLC  
REGARDING THE APRIL 2021 DATA INCIDENT,  
YOU MAY BE ELIGIBLE FOR PAYMENT AND  
CREDIT MONITORING SERVICES FROM A  
CLASS ACTION SETTLEMENT.**

*Si desea recibir esta notificación en español,  
llámenos o visite nuestra página web,*

**[www.RPM DataSettlement.com](http://www.RPMDataSettlement.com)**

UNIQUE CLAIMANT ID: [REDACTED]

Postal Service: Please do not mark barcode

64105-P015-T1993-0905454\*\*\*\*\*AUTO\*\*5-DIGIT 73034  
Caleb Rowton  
[REDACTED]



To Settlement Administrator

RPM

To RRM Data Incident Settlement

Regarding Hightower et al vs Receivables Performance  
Management LLC Case No. 2:22-cv-01683-RSM

Claimant ID: [REDACTED]

- I wish to stay in the settlement but I hereby object to the grossly low amount of payment from the notice I attached. I have suffered hacking, ID theft and much more. I will also write the judge over this case reflecting my thoughts and the prosecutor. I wish to stay in Settlement class but will aggressively pursue punitive damages.  
Best regards

Caleb Andrew Rounton

PM

Nov 12, 2024

RPM Data Incident Settlement  
c/o Kroll Settlement Admin Cc  
P/O Box 225391  
New York, NY 10150-5391

10150-5300.00

# Exhibit F



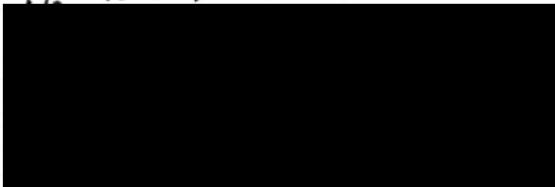
COR0000327

Nov. 11, 2024

My objection is in agreement with all parties of the settlement.

[Signature] [Redacted]  
[Redacted]

LL Tullis Jones



BIRMINGHAM AL 350

18 NOV 2024 PM 5 L



PPM Data Incident Settlement  
c/o kroll Settlement Administration LLC  
P.O. Box 225391  
New York, NY 10150 5391

10150-539191

